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**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

JOSEPH WALSH,

3:15-cv-01666 SI

PLAINTIFF,

DECLARATION OF TRACEY LE

v.

**(In Support of Defendants' Motion for
Summary Judgment)**

**BRYANT ENGE, CHARLIE HALES,
CITY OF PORTLAND,**

DEFENDANTS.

I, Tracey Le, declare as follows:

1. I am employed by the City of Portland, Bureau of Technology, as a business system analyst. I have held this position since 2008.
2. Some of my responsibilities include support of Bureaus'/Offices Content Manager to maintain their website, and make sure the City Council videos are available on the website.
3. I am part of a three person team responsible for maintaining and uploading City Council meeting videos on City Council YouTube channel and on the City's website.

4. All City Council meetings are video-recorded and live-streamed on the internet and public access channel 30 by a vendor, Portland Community Media (PCM).

5. Once the Council session is complete, PCM provides the video to the City of Portland Bureau of Technology who becomes the custodian of these recordings.

6. The video footage is maintained for archival purposes for eternity.

7. Video from City Council meetings from June 23, 2015 to the present are available on the City's webpage, <http://www.portlandoregon.gov/video/player/?tab=council>. They are also available on YouTube.

8. Beginning in June 2015, the City began to move all its City Council videos from the City webpage to a YouTube channel, <https://www.youtube.com/channel/UCCpIUh7CWwtBXisMPHWG65g/playlists>.

9. Older videos are being migrated to YouTube as we receive requests for them.

10. City Council meeting videos are public records and can be obtained by making a public records request to the City.

11. Attached to this Declaration as Exhibit A is a DVD containing a true and correct copy of excerpts from videotapes of City Council meetings held in 2014-2015.

12. The video on Exhibit A labeled as "cc010914" is a true and correct copy of video from the City Council afternoon meeting on January 9, 2014.

13. The video on Exhibit A labeled as "cc031214" is a true and correct copy of video excerpts from the City Council morning meeting on March 12, 2014.

14. The video on Exhibit A labeled as "cc050714" is a true and correct copy of video excerpts from the City Council morning meeting on May 7, 2014.

15. The video on Exhibit A labeled as "cc091014" is a true and correct copy of video excerpts from the City Council morning meeting on September 10, 2014.

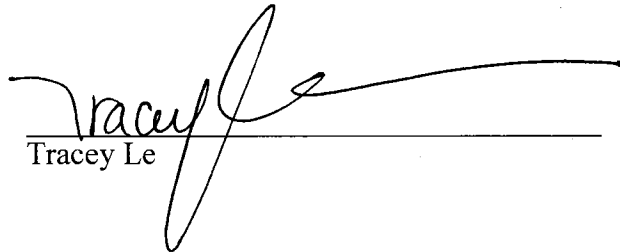
16. The video on Exhibit A labeled as “cc051315” is a true and correct copy of video from the City Council afternoon meeting for May 13, 2015.

17. The video on Exhibit A labeled as “cc070815” is a true and correct copy of video excerpts from the City Council morning meeting on July 8, 2015.

18. I make this declaration in support of Defendants’ Motion for Summary Judgment.

I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: October 27, 2015.


Tracey Le

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing DECLARATION OF TRACEY LE on:

Joseph F. Walsh
7348 SE Division Street
Portland, OR 97206
Plaintiff-Pro Se

on October 30, 2015, by causing a full, true and correct copy thereof, addressed to the last-known address (or fax number) of said attorney, to be sent by the following method(s):

- ☒ by **mail** in a sealed envelope, with postage paid, and deposited with the U.S. Postal Service in Portland, Oregon.
- ☐ by **hand delivery**.
- ☒ by **email** pursuant to LR 5-2(b).
- ☐ by **facsimile transmission**.
- ☐ by **email**.

Dan Simon

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